

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**DEBTOR'S FORTY-SECOND OMNIBUS OBJECTION TO CERTAIN  
CLAIMS**

**(Bond Claims that Have Been Satisfied or Released)**

**THIS OBJECTION SEEKS TO MODIFY, DISALLOW AND/OR EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD CAREFULLY REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON THE EXHIBIT ATTACHED TO THIS OBJECTION.**

The Debtor, the City of Detroit ("City"), by and through its undersigned counsel, files this objection ("Objection") requesting that the Court enter an order, substantially in the form attached as Exhibit 1, disallowing and expunging each of the claims identified on Exhibit 2 on the basis that each claim has been satisfied or released pursuant to the Plan and Confirmation Order (each, defined below). In support of this Objection, the City respectfully states as follows:

## **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Objection pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII, Section A of the Plan . This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

## **BACKGROUND FACTS**

2. On July 18, 2013 (“Petition Date”), the City filed a petition for relief in this Court, thereby commencing the largest Chapter 9 bankruptcy case in history.

3. On October 10, 2013, the City filed its *Motion of Debtor, Pursuant to Section 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), For Entry of an Order Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* [Doc. No. 1146] (“Bar Date Motion”). On November 21, 2013, the Court entered an order granting the Bar Date Motion [Doc. No. 1782] (“Bar Date Order”), establishing deadlines to file proofs of certain types of claim in this case. The Bar Date Order set the deadline to file such proofs of claim as February 21, 2014 at 4:00 p.m., Eastern Time (“Bar Date”).

4. However, not all types of claims were subject to the Bar Date Order. The Bar Date Order expressly provided that entities holding the following claims “shall not be required” to file proofs of claim:

- (a) Any claim by a holder for the repayment of principal, interest and/or other applicable fees and charges on or under (i) the bonds set forth on Exhibit 6.1 to the Bar Date Motion (“Secured Bonds”) or (ii) certificates of participation issued by the City.
- (b) Any claim by a holder for the repayment of principal or interest on or under the City’s unlimited tax general obligation bonds, limited tax general obligations bonds and general fund bonds (collectively, the “GO Bonds”) to preserve its right to a *pro rata* share of distributions on account of the amount of principal and interest under such bonds listed in the City’s List of Claims.

Bar Date Order ¶¶ 8(d) & (e).

5. The Bar Date Notice attached as Annex 1 to the Bar Date Order explained that holders of Secured Bonds did not have to file a proof of claim for repayment of principal, interest and/or other applicable fees and charges because the trustee or similar entity with respect to the Secured Bonds informed the City that consistent with Bankruptcy Rule 3003(c) it intended to file proofs of claim against the City on behalf of the holders of the Secured Bonds and provide notice to the holders of the Secured Bonds. Bar Date Notice, p. 4.

6. Indeed, as permitted by Bankruptcy Rule 3003(c)(1) and (5), U.S. Bank National Association, as Indenture Trustee, filed proofs of claim on behalf of

all known and unknown holders of the Secured Bonds. *See* Claim Numbers 1339, 1340, 1368, 1369, & 1370.

7. Similarly, the Bar Date Order did not require that holders of GO Bonds file proofs of claim in order to preserve their rights to receive payments on account of principal or interest under the GO Bonds. Bar Date Notice, p. 4.<sup>1</sup>

The Bar Date Notice provided that the classification, priority and treatment of claims for *principal and interest* under the GO Bonds pursuant to any Chapter 9 Plan would not be affected by any provision in the Bar Date Order or by whether or not the holders of GO Bonds file or do not file proofs of claim.<sup>2</sup>

8. Despite the express instructions in the Bar Date Order and the Bar Date Notice (which did not require but did not prohibit the filing of proofs of claim by the holders of Secured Bonds or GO Bonds),<sup>3</sup> hundreds of persons and other entities filed proofs of claims for repayment of principal or interest on or under the

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<sup>1</sup> However, the holders of GO Bonds were required to file proofs of claim for “amounts beyond principal and interest” under the GO Bonds.

<sup>2</sup> The bond insurers of the GO Bonds were required to file proofs of claim relating to the GO Bonds. Bar Date Notice, p.4. As bond insurers of the unlimited tax GO Bonds, Assured Guaranty Municipal Corp. (Claim Numbers 1168 & 1169), National Public Finance Guarantee Corporation (Claim Number 1040), Ambac Assurance Corporation (Claim Numbers 1060, 1076, 1083, 1089, 1106, 1110), and Syncora Guarantee, Inc. and Syncora Capital Assurance, Inc. (Claim Numbers 1352 & 1354) filed proofs of claim. As a bond insurer of the limited tax GO Bonds, Ambac Assurance Corporation filed proofs of claim. *See* Claim Numbers 1147, 1149, 1118, 1119, 1121, 1122, 1050, 1134).

<sup>3</sup> Although not required to file such proofs of claim, nothing in the Bar Date Order or the Bar Date Notice prohibited the filing proofs of claim by the holders of the Secured Bonds or GO Bonds. Apparently, although unnecessary, many holders elected to do so in an abundance of caution.

GO Bonds or the Secured Bonds (see Exhibit 2), necessitating the filing of this Objection.

9. On July 9, 2014, this Court entered its *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 Approving Claim Objection Procedures* [Doc. No. 5872] (“Claims Procedures Order”), allowing the City to file omnibus objections with respect to claims that have been addressed by the Plan or otherwise are not subject to the claims process in this case. (Claim Procedures Order at 2.)

10. Furthermore, Bankruptcy Rule 3007(d)(5) permits omnibus objections on the grounds that the claims should be disallowed because “they have been satisfied or released during the case in accordance with the Code, applicable rules, or a court order”.

11. On October 22, 2014, the City filed the *Eighth Amended Plan of the Adjustment of Debts of the City of Detroit (October 22, 2014)* [Doc. No. 8045] (“Plan”).

12. On November 12, 2014, this Court entered an Order confirming the Plan [Doc. No. 8272] (“Confirmation Order”). On December 31, 2014, this Court entered its Supplemental Opinion Regarding Plan Confirmation, Approving Settlements, and Approving Exit Financing [Doc. No. 8993] (“Confirmation Opinion”).

13. The Plan became effective on December 10, 2014 (“Effective Date”).

14. The Plan comprehensively resolved, classified and treated all claims for principal, interest, and/or other applicable fees and charges under the Secured Bonds and the GO Bonds.

15. Claims for the Secured Bonds were unimpaired, classified and reinstated in Classes 1A – 1C and 2A – 2F of the Plan. Plan, Article II.B.1, p. 32. Consequently, claims evidenced by the Secured Bonds have been satisfied.

16. Claims for the GO Bonds were settled. Confirmation Opinion, pp. 51 – 58. These claims were classified and allowed in certain aggregate amounts in Classes 7 and 8 of the Plan. Plan, Article II.B.1, p. 32. On or about the Effective Date, the treatment to be afforded to the holders of claims in Classes 7 and 8 of the Plan, was consummated and satisfied under the Plan. On the Effective Date, the remaining portion of any claim in Class 7 or 8 was released and discharged under the Plan. Plan, Article III.D.4.

17. In sum, all claims for repayment of principal, interest and/or other applicable fees and charges on or under the Secured Bonds or the GO Bonds were satisfied by their treatment under the Plan and, in the case of the GO Bonds, to the extent not so satisfied, released and discharged under the Plan.

18. Each of the claims listed on Exhibit 2 asserts a bond claim that has been satisfied under the Plan (or released and discharged) and should be disallowed and expunged.

## **RELIEF REQUESTED**

19. The City files this Objection pursuant to the Bar Date Order, Section 502(b) of the Bankruptcy Code,<sup>4</sup> Bankruptcy Rule 3007(d), and the Claims Procedures Order, seeking entry of an order disallowing and expunging each of the claims identified on Exhibit 2 because each such claim asserts a bond claim that has been satisfied (or released) pursuant to the terms of the Plan and the Confirmation Order.

20. To the extent the Court does not disallow and expunge one or more of the claims identified on Exhibit 2, the City reserves all of its rights to object, on any basis, to any of the claims identified on Exhibit 2.

## **BASIS FOR RELIEF REQUESTED**

21. The City has reviewed the claims identified on Exhibit 2 and submits that that each such claim is a bond claim that has been satisfied or released by the Plan.

22. The Declaration of Charles Raimi, Deputy Corporation Counsel, (the “Declaration”) explains the process undertaken by the City and confirms that the claims identified on Exhibit 2 are bond claims that have been satisfied or released under the Plan. *See Declaration of Charles Raimi*, attached hereto as Exhibit 3.

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<sup>4</sup> Section 502 of the Bankruptcy Code applies to Chapter 9 proceedings pursuant to Section 901(a) of the Bankruptcy Code.

23. The Claims Procedures Order and Bankruptcy Rule 3007(c) allow the City to file this Objection as an omnibus objection. Specifically, Bankruptcy Rule 3007(c) authorizes the Court to allow for omnibus objections beyond those circumstances itemized in Bankruptcy Rule 3007(d), and the Claims Procedures Order expressly permits the City to file an omnibus objection with respect to claims that have been satisfied by the Plan. (Claims Procedures Order at 2.). This is further supported by the authority granted in Bankruptcy Rule 3007(d)(5).

24. This Court has the authority to enter an order approving this Objection. Moreover, the streamlined process afforded by an omnibus objection (in lieu of individual objections to each of the claims identified on Exhibit 2) will result in material costs savings that will inure to the benefit of the City. Accordingly, the City believes that the relief sought by this Objection is in the best interests of the City and its creditors.

25. Based upon the foregoing, the City seeks entry of an order, substantially in the form annexed as Exhibit 1, expunging and disallowing each of the claims identified on Exhibit 2. Accordingly, pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007(d)(5), the Court should grant the relief requested.



## **SEPARATE CONTESTED MATTERS**

26. To the extent that a response is filed regarding any claim listed in this Objection and the City is unable to resolve the response, each one of those claims, and the objection by the City to each one of those claims asserted, should constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection should be deemed a separate order with respect to each such claim and, to the extent necessary under Bankruptcy Rules 7054 and 9014, should constitute a final judgment with respect to such claim, and the Court should expressly determine that there is no just reason for delay of the entry of the final judgment with respect to such claim.

27. The City files this Objection without prejudice to or waiver of its rights pursuant to section 904 of the Bankruptcy Code, and nothing herein is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

## **NOTICE**

28. The City has provided notice of this Objection to each of the claimants identified on Exhibit 2 at the address set forth by each of the claimants on its respective proof of claim, and all other parties who have requested notice pursuant to Bankruptcy Rule 2002. Given the nature of the relief requested, the City respectfully submits that no other or further notice of this Objection need be given.

WHEREFORE, the City respectfully requests that this Court enter an order, substantially in the form attached as Exhibit 1, granting the relief requested herein and granting the City such other and further relief as the Court may deem just and proper.

Dated: March 24, 2016

Respectfully submitted,

By: /s/ Marc N. Swanson

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ATTORNEYS FOR THE CITY OF DETROIT

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**NOTICE OF DEBTOR'S FORTY-SECOND OMNIBUS OBJECTION TO  
CERTAIN CLAIMS**

**(Bond Claims that Have Been Satisfied or Released)**

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE  
ATTACHMENTS HERETO TO DETERMINE WHETHER THIS  
OBJECTION AFFECTS YOUR CLAIMS(S).**

**PLEASE TAKE NOTICE THAT** the City of Detroit ("City") has filed an objection to your claim because it asserts a bond claim that has been satisfied or released under the City's Plan ("Forty-Second Omnibus Objection") and, therefore, should be disallowed and expunged.

**YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED  
PURSUANT TO FED. R. BANKR. P. 3007(e)(1) AND PRIOR ORDERS OF  
THIS COURT. YOU SHOULD CAREFULLY REVIEW EXHIBIT 2 OF  
THE FORTY-SECOND OMNIBUS OBJECTION TO FIND YOUR NAME  
AND CLAIM. YOU SHOULD READ THESE PAPERS CAREFULLY AND  
DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.**

If you do not want the court to eliminate or change your claim, or grant the relief requested in the Forty-Second Omnibus Objection, then on or before **April 20, 2016**, you or your lawyer must:

1. File with the court, at the address below, a written response to the objection. Unless a written response is filed and served by the date stated above, the court may decide that you do not oppose the objection to your claim.

Clerk of the Court  
United States Bankruptcy Court  
211 W. Fort Street, Suite 2100  
Detroit, MI 48226

If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

2. A copy of your response must also be mailed to counsel for the City:

Marc N. Swanson  
Miller, Canfield, Paddock and Stone, PLC  
150 West Jefferson, Suite 2500  
Detroit, MI 48226

3. You must also attend the hearing on the objection scheduled to be held on **April 27, 2016, at 11:00 a.m. in Courtroom 1925, 211 W. Fort Street, Detroit, MI 48226** unless your attendance is excused by mutual agreement between yourself and the objector's attorney.

**If you or your attorney does not take these steps, the court may decide that you do not oppose the objection to your claim, in which event the hearing will be cancelled and the objection sustained.**

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Marc N. Swanson

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Dated: March 24, 2016

## **EXHIBIT 1: PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER GRANTING DEBTOR'S FORTY-SECOND OMNIBUS  
OBJECTION TO CERTAIN CLAIMS**

**(Bond Claims that Have Been Satisfied or Released)**

Upon review of the forty-second objection to claims (the “Objection”),<sup>5</sup> of the Debtor, City of Detroit, Michigan (the “City”), seeking entry of an order disallowing and expunging each of the claims listed on Exhibit 2 to the Objection; and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be

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<sup>5</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.



given; and a hearing on the Objection having been held before the Court; and any objections or other responses to the Objection having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Objection and at the hearing establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore;

IT IS ORDERED that:

1. The Objection is sustained to the extent set forth herein.
2. Each of the proofs of claim listed on Exhibit 2 annexed to the Objection is hereby disallowed and expunged in its entirety, pursuant to Section 502(b) of the Bankruptcy Code.
3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.
4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
5. Each claim and the objections by the City to each claim as addressed in the Objection and set forth in Exhibit 2 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed and constitute a separate order with respect to each such claim and, to the extent necessary under Bankruptcy Rules 7054 and 9014, constitutes a final judgment with respect to such claim, and the Court expressly determines that there is no just

reason for delay of the entry of the final judgment with respect to such claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and for which such stay has been granted or may be in effect, and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right, but not the need, to submit a separate order with respect to contested matters or claims.

6. The City retains all of its rights to object, on any other basis, to any of the Claims identified on Exhibit 2.

7. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

8. Nothing in this Order is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

## **EXHIBIT 2: CLAIMS**

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
962	Michael D and Deborah D Thompson 5222 Sunlyn Grand Blanc, MI, 48439	5,605.40	Secured	02/13/2014
962	Michael D and Deborah D Thompson 5222 Sunlyn Grand Blanc, MI, 48439	14,394.60	General Unsecured	02/13/2014
251	Mitchell & Phyllis Hill 1794 Fox Hill Drive Lakeland, FL, 33810	10,000.00	Secured	12/16/2013
271	Mitchell E Hersh 6 Western Dr Colts Neck, NJ, 07722-1271	100,000.00	General Unsecured	12/17/2013
442	Murray and Renee Nadel 12 Island Drive Boynton Beach, IL, 33436	45,000.00	General Unsecured	01/06/2014
459	Murray Spitzer Trust Murray Spitzer 12622 Via Lucia Boyton Beach, FL, 33436	15,000.00	General Unsecured	12/30/2013
430	Nancy Gross Revocable Trust TR UA 04-19-2011 Nancy Gross 11909 SE Indiana River Dr N Hobe Sound, FL, 33455	10,000.00	General Unsecured	01/02/2014
584	Nancy Irene Koenig & Lawrence T Koenig Jr JTWROS 16129 Dewey Ave Omaha, NE, 68118	25,000.00	General Unsecured	01/22/2014
663	Nancy S. Granborg TTEE, Granborg Family Trust Nancy S. Granborg, TTEE P.O. Box 6695 Incline Village, NV, 89450	19,364.90	General Unsecured	01/30/2014
3198	Nedi Telvi 635 West 42nd St 33D New York, NY, 10036	15,300.00	General Unsecured	02/21/2014
447	Neil Dicker 1616 Borkwood Dr Orefield, PA, 18069-8923	20,000.00	General Unsecured	01/07/2014
1053	Neil James Peterson Trustee, Peterson Revocable Living Trust 6800 Liberty Rd Galt, CA, 95632	5,000.00	General Unsecured	02/18/2014

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
1055	Neil James Peterson Trustee, Peterson Revocable Living Trust 6800 Liberty Rd Galt, CA, 95632	5,000.00	General Unsecured	02/18/2014
1056	Neil James Peterson Trustee, Peterson Revocable Living Trust 6800 Liberty Rd Galt, CA, 95632	5,000.00	General Unsecured	02/18/2014
1044	Nicholas G. Spanos 108 Ross Creek Lane Venetia, PA, 15367	6,375.00	General Unsecured	02/18/2014
255	Pamela Ann Foster 829 Country Club Cir Venice, FL, 34293	10,000.00	Secured	12/16/2013
689	Patricia B. Lantis 13510 Hollow Cv Tampa, FL, 33613-4128	9,568.20	General Unsecured	02/03/2014
339	Patti M. Dickinson 10851 Grant Rd. Montgomery, MI, 49255	41,418.18	Secured	12/23/2013
1023	Paul S Dennis, TTEE Paul S. Dennis Trust Agreement as Modified UAD 8/9/83 16330 Vintage Oaks Lane Delray Beach, FL, 33484-6430	325,000.00	Priority	02/14/2014
1057	Paul S Dennis, TTEE Paul S. Dennis Trust Agreement as Modified UAD 8/9/83 16330 Vintage Oaks Lane Delray Beach, FL, 33484-6430	325,000.00	General Unsecured	02/18/2014
209	Peter J & Pamela A Gadzinski JT TEN/WROS 1075 Riverview Drive Ishpeming, MI, 49849	15,000.00	General Unsecured	12/12/2013
207	Peter J & Pamela Gadzinski JT TEN/ WROS 1075 Riverview Drive Ishpeming, MI, 49849	10,000.00	General Unsecured	12/12/2013
878	Philip R. Ober 4254 Echo Rd Bloomfield, MI, 48302-1943	UNLIQUIDATED	General Unsecured	02/12/2014

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
2219	Prides Crossing Foundation Daniel R. Irvin 27 Paine Avenue PO Box 252 Prides Crossing, MA, 01965	515,000.00	General Unsecured	02/20/2014
389	Rae Thaler, Irrevocable Trust, Amy E. Schultz, Trustee Amy E. Schultz, Trustee Rae Thaler Irrevocable Trust 2214 Genevieve Ct Tallahassee, FL, 32312	UNLIQUIDATED	General Unsecured	12/23/2013
480	Reddington Village Condo Owners Association Judith Beery 175 Reddington Village Ln Newark, OH, 43055	5,000.00	General Unsecured	01/08/2014
237	Rhonda Feltman Stephen Feltman PO Box 1311 Sonoita, AZ, 35637	25,000.00	General Unsecured	12/16/2013
450	Richard B Decker 1351 McCormicks Cir Danville, IN, 46122	25,000.00	Secured	01/02/2014
451	Richard B Decker 1351 McCormicks Cir Danville, IN, 46122	10,000.00	Secured	01/02/2014
452	Richard B Decker 1351 McCormicks Cir Danville, IN, 46122	25,000.00	Secured	01/02/2014
241	Richard T. Shaw 62 Oakmont Lane Jackson, NJ, 08527-4019	10,870.00	General Unsecured	12/16/2013
649	Richard W. Van Saun 15812 75th Pl. W. Edmonds, WA, 98026	30,000.00	General Unsecured	01/27/2014
215	Robert & Patricia Taylor 3805 Quail Covey Dr Valparaiso, IN, 46383	10,000.00	General Unsecured	12/13/2013
512	Robert A Imparato Jr. 583 Ramona Ave Staten Island, NY, 10309	5,000.00	General Unsecured	01/13/2014

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
400	Robert Alan Neidorff Robert Neidorff 39 Stowell Rd Bedford, NH, 03110-4714	20,247.22	General Unsecured	12/23/2013
696	Robert B. Faber 19 Robin Circle Stoughton, MA, 02072	UNLIQUIDATED	Secured	02/03/2014
463	Robert Bofenkamp 2808 E Orchard Place #203 Sioux Falls, SD, 57103	UNLIQUIDATED	Priority	12/31/2013
318	Robert Branch, Sr. Trustee Robert Branch, Sr. 2401 Pruetts Chapel Road Paragould, AR, 72450	10,000.00	General Unsecured	12/20/2013
2369	Robert Gutman 1999 Family Trust FBO John A Gutman Part A John Gutman, Trustee PO Box 6067 Lawrenceville, NJ, 08698-0067	15,000.00	General Unsecured	02/21/2014
595	Robert K DeVries & Nancy L. DeVries 63 Lake End Road Newfoundland, NJ, 07435	19,638.74	General Unsecured	01/24/2014
524	Robert N. Radunzel, FBO Robert N. Radunzel Revocable Trust, UAD 2-24-95 Robert N. Radunzel 10181 S. Lakeside Ridge Road Baldwin, MI, 49304-8463	20,000.00	Secured	01/13/2014
401	Rod C. Parsons PO Box 528 Shelbyville, TN, 37162	20,000.00	General Unsecured	12/23/2013
502	Sami Y Kalliney and Elizabeth E Kalliney 15430 Almaco Circ Bonita Springs, FL, 34135-8391	10,000.00	General Unsecured	01/10/2014
577	Samuel Shniper 40 Seir Hill Road Wilton, CT, 06897	15,000.00	General Unsecured	01/21/2014
839	Sandra B DuPont Living Trust UAD 1-7- 1983 Kent G & Sandra B DuPont Co-Trustees 5500 Blood Rd. Metamora, MI, 48455	25,000.00	General Unsecured	02/06/2014

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
583	Sandra LeGunn Kasten Trust dtd 10/18/1989 - Sandra LeGunn TTEE 7280 Amberly Lane - Apt. 206 Delray Beach, FL, 33446-2958	15,000.00	General Unsecured	01/22/2014
217	Scott Muma 120 Holley Ridge Road Aiken, SC, 29803	67,892.03	Secured	12/13/2013
347	Selig C. Eidelberg and Bayla Eidelberg, JT 50 Bristol Green San Antonio, TX, 78209-1848	20,000.00	Secured	12/24/2013
507	Sheldon Borgen & Carol Borgen JT Ten 184-44 Midland Parkway Jamaica Estates, NY, 11432	20,000.00	General Unsecured	01/13/2014
432	Stuart Gross & Nancy Gross TR UA 04-19- 2011 Stuart Gross Revocable Trust Stuart Gross 11909 SE Indiana River Dr N Hole Sound, FL, 33455	30,000.00	General Unsecured	01/02/2014
1054	Susan A. Johnston and Forrest R. Johnston 318 Grandview Dr Verona, PA, 15147-3898	UNLIQUIDATED	General Unsecured	02/18/2014
3592	Susan Fitzgerald 494 N Meadow Cr Rd Pomeroy, WA, 99347	50,000.00	General Unsecured	02/25/2014
574	Sussman Family Trust Marvin Sussman, Trustee 1191 NW 89th Terrace Pembroke Pines, FL, 33024-4634	50,000.00	General Unsecured	01/17/2014
1328	The Barbara L. Schuman Trust co Marc Schuman Trustee 15 Bank St Apt 121A White Plains, NY, 10606	45,000.00	Secured	02/20/2014
172	The Virgil L Burns Living Trust Virgil L Burns 785 Poseidon Ct Lake Havasu City, AZ, 86404	10,000.00	General Unsecured	12/10/2013
518	Thomas & Donna Leiting 844 Stonebridge Circle Eldridge, IA, 52748	25,000.00	General Unsecured	01/16/2014



The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
302	Thomas and Linda Simmons 2020 Windsor Pl Forth Worth, TX, 76110	25,000.00	General Unsecured	12/19/2013
613	Tim A. Geffert and Bobbie D. Geffert Tim Geffert 801 Airline Rd Corpus Christi, TX, 78412-3159	5,000.00	General Unsecured	01/22/2014
850	Tracy Andersen 416 Boutell Drive Grand Blanc, MI, 48439	8,408.10	Secured	02/07/2014
850	Tracy Andersen 416 Boutell Drive Grand Blanc, MI, 48439	21,591.90	General Unsecured	02/07/2014
881	Vittorio Gimelli 218 Highland Avenue Montclair, NJ, 07043	5,066.67	General Unsecured	02/12/2014
296	Walter C. Shepard, Trustee of the Walter C. Shepard Revocable Trust Under Agreement Dated 10/05/1992, As Amended Walter C. Shepard, Trustee PO Box 68 Cocoa, FL, 32923-0068	150,000.00	General Unsecured	12/18/2013
171	Walter Cholewa Jr 1328 Sierry Peaks Dr Prescott, AZ, 86305	9,200.81	General Unsecured	12/10/2013
510	Walter J Cavanaugh Jr 306 Tahiti Rd Galveston, TX, 77554-9185	30,000.00	General Unsecured	01/13/2014
410	William Boyd Bailey, Tte, Bailey Rev Liv Trust Uad 7/25/2007 16247 East Bajada Drive Scottsdale, AZ, 85262-7771	UNLIQUIDATED	Secured	12/27/2013
1111	William Foggie Trust 7170 Woodbridge Circle Boca Raton, FL, 33434	30,000.00	General Unsecured	02/19/2014
1112	William Foggie Trust 7170 Woodbridge Circle Boca Raton, FL, 33434	25,000.00	General Unsecured	02/19/2014
406	William J. Schoen Revocable Trust 5801 Pelican Bay Blvd Suite 502 Naples, FL, 34108	400,000.00	General Unsecured	12/23/2013

The ground for objection to each claim listed below is that it is a bond claim that has been satisfied or released.  
Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim No.	Creditor Name and Address	Claim Amount	Classification	Date Filed
332	William L Sundy 4825 S.W. 170 Ave Southwest Ranches, FL, 33331	10,000.00	General Unsecured	12/23/2013
631	William R. Goodall & Carol Ann Goodall 12706 Moorestown Rd SE Fife Lake, MI, 49633	50,000.00	General Unsecured	01/27/2014
84	William R. Harter 5196 Coventry Lane Fort Wayne, IN, 46804	UNLIQUIDATED	General Unsecured	09/10/2013
3348	William S. Shingler Trustee u/a DTD 12/20/2001 3557 Carnoustie Ct. Augusta, GA, 30907	23,466.75	General Unsecured	02/21/2014

**EXHIBIT 3: DECLARATION OF CHARLES RAIMI**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**DECLARATION OF CHARLES RAIMI IN SUPPORT OF DEBTOR'S  
FORTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS**

**(Bond Claims that Have Been Satisfied or Released)**

I, Charles Raimi, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am a Deputy Corporation Counsel for the City of Detroit. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

2. The City's ongoing claims reconciliation process involves the collective effort of a team of employees assembled from personnel specifically familiar with the operations and liabilities of the City. This team works together and in conjunction with City's counsel, the City's financial advisor, and the City's claims agent, to review proofs of claim filed against the City.

3. In connection with the preparation of the Forty-Second Omnibus Objection to Certain Claims (Bond Claims that Have Been Satisfied or Released)

(the “Forty-Second Omnibus Objection”), the City reviewed the claims at issue, as described on Exhibit 2 of the Forty-Second Omnibus Objection.

4. The City believes that each of the claims on Exhibit 2 should be disallowed and expunged because each such claim asserts a bond claim that has been satisfied or released by the *Eighth Amended Plan of the Adjustment of Debts of the City of Detroit (October 22, 2014)*.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 3/23/16, 2016

By: /s/   
Charles Raimi

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 24, 2016, he electronically filed the foregoing Omnibus Objection to Certain Claims (the “Omnibus Objection”) with the Clerk of the Court which sends notice by operation of the court’s electronic filing service to all ECF participants registered to receive notice in this case. The City has engaged a Noticing Agent, which will serve the Omnibus Objection on the Claimants listed therein at the address set forth by each of the claimants on its respective proof of claim and on all parties requesting notices listed on the Master Service List, and file a subsequent Proof of Service after it has performed the service.

DATED: March 24, 2016

By: /s/ Marc N. Swanson

Marc N. Swanson

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

swansonm@millercanfield.com